

## NGĀTI WHĀTUA ŌRĀKEI WHAI RAWA PRIVACY STATEMENT

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This privacy statement explains how Ngāti Whātua Ōrākei Whai Rawa Limited (**Whai Rawa**) and its wholly owned entities<sup>1</sup> manages the personal information we hold. It explains what information we collect, why we need it, how we'll use it and who we might share it with. It also explains how we protect personal information and your rights to access or correct the information we hold about you.

Whai Rawa is the commercial investment company of the Ngāti Whātua Ōrākei group, responsible for protecting and growing its commercial assets. Most of the personal information we collect, use, store and share is about registered members of Ngāti Whātua Ōrākei (**members**). We also handle personal information about other people we interact with, such as individuals we do business with or people who make enquiries via our website.

We may update this privacy statement from time to time, to reflect changes to privacy law or our operations. This privacy statement was last updated in March 2025.

### What personal information we collect about you

We need to collect personal information to deliver services to our members, including:

- our savings and investment scheme (Toi Tupu)'
- providing finance for housing; and
- providing whānau housing.

We may also need to collect personal information about you if we do business with you (for example, to manage our commercial investments and developments).

We collect most of this information directly from you but may also collect information from third parties which have your authorisation to share this with us or where we have a lawful right to collect it.

Depending on our relationship with you and/or the type of services we are providing to you we will collect different types of personal information about you.

For example:

- If you apply to join Toi Tupu we will collect information when you enrol including your name, contact details and address, your Ngāti Whātua Ōrākei hapū number, information about any children you enrol in the scheme, and copies of identification documents (such as drivers licence, passport or birth certificate). We will also collect or create information about your membership of the scheme such as transactions on your Toi Tupu account. If you apply to make a withdrawal for the reasons of financial hardship we will collect additional personal information from you to assess your application. We also collect information about your activity within the My Toi Tupu portal on our website (such as when you logged in, and what actions you took within the portal).

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<sup>1</sup> Including the Whai Rawa Housing LP, Whai Rawa Residential Properties LP, Ngāti Whātua Ōrākei Housing Trust and Ngāti Whātua Ōrākei Housing Trust (No.2).

- If you apply for housing finance, e.g. for the Kāinga Tuatahi housing development, we will collect financial information about your finances including credit information to assess your application. If your application is accepted we will collect or create information about transactions relating to any loan provided (including in respect of any arrears).
- If you apply to become a tenant or leaseholder of one of our properties we will collect financial information about you including credit information. We will also collect or create information about your tenancy/lease including transaction details (including in respect of any arrears) and information relating to maintenance of the property.
- If you apply for shared ownership, e.g. for the Hawaiki housing development, we will collect information about you including financial information. We will also collect or create information about transactions relating to our shared ownership.
- If you apply to become a business under Te Toi Pakihi scheme through Ngāti Whātua Ōrākei Whai Māia Limited (**Whai Māia**) we will collect relevant personal information about you from Whai Māia so we can promote your business while carrying out our commercial activities.

If we interact with you because we are doing business with you (e.g. you are employed by one of our business partners or suppliers) we may collect some personal information about you such as your name and work contact details.

We may also collect personal information about you when you communicate with us, including via social media or our website.

We collect information about how people use our website using cookies and other analytics tools, but this information is not identifiable.

### **How we use your personal information**

Your personal information helps us deliver services to members and manage our investments and developments. To meet these purposes, we may use your information:

- To assess applications for enrolment in Toi Tupu, for housing finance, or to become a tenant/leaseholder/shared owner of one of our properties.
- To manage your enrolment and ongoing membership of Toi Tupu, including making scheduled withdrawals as well as assessing any applications to withdraw funds for home purchasing or for financial hardship reasons.
- To manage any finance provided to you, or your tenancy/lease/shared ownership of our properties. This may include taking steps to recover arrears or enforce any other relevant rights we have.
- To confirm your membership as a member of Ngāti Whātua Ōrākei with the Ngāti Whātua Ōrākei Trust.
- To update the Ngāti Whātua Ōrākei Trust membership roll where necessary (including sharing copies of any identification documentation you have provided us with the Trust for this purpose).
- To assist with delivering membership services to you that are provided by Whai Maia or the Trust.
- To communicate with members about our activities including about the services we provide.
- For any other purpose where we are required or authorised by law to do so.

## **When we disclose your personal information**

In order to meet the purposes for which we collect personal information, we may need to disclose information to third parties from time to time. We may disclose personal information about you for the above purposes to:

- The Ngāti Whātua Ōrākei Trust Board or Whai Māia.
- Our trusted partners and service providers (such as providers of IT services, online forms (Cognito), and registry services (for Toi Tupu)).
- Third party financial institutions, where you have a loan related to a property that we lease to you.
- Any other third party where we are required or authorised by law to do so.

## **How we protect your personal information**

We store all personal information we collect in secure systems that can only be accessed by the right people when they need it to do their job. We use secure cloud platforms to store and process information. We retain personal information only for as long as we need it.

We take all reasonable steps to protect the personal information we hold from loss, misuse or unauthorised access, modification or disclosure, including:

- providing our employees with training on good information security practices;
- regularly security testing our systems and platforms to ensure they are up to date and protected;  
and
- requiring all our employees to maintain confidentiality in respect of personal information.

## **You can access or correct your personal information at any time**

You have the right to ask us for a copy of the information we hold about you, or to ask us to correct it if you think it's wrong. To make a privacy request, update your information, or tell us about any concerns, please:

- visit us at: Level 1, AECOM Building, 8 Mahuhu Crescent, Auckland Central, 1010
- call us on: +64 9 972 2363
- email us at: [wrl@ngatiwhatuaorakei.com](mailto:wrl@ngatiwhatuaorakei.com)

## **Tell us if you have concerns about your information**

If you have any concerns about the way we've collected, used or shared your information, or you think we have refused a request for information without a good reason, then please let us know using the contact details above and we'll try our best to resolve them.